RECEIVED FILED SERVED ON **ENTERED** PAT LUNDVALL (NSBN 3761) 1 COUNSEL/PARTIES OF RECORD McDONALD CARANO WILSON LLP 100 West Liberty Street, 10th Floor 2 P.O. Box 2670 MAY 2 5 2011 Reno, Nevada 89505-2670 3 lundvall@mcdonaldcarano.com Telephone: (775) 788-2000 Facsimile: (775) 788-2020 CLERK US DISTRICT COURT 4 DISTRICT OF NEVADA DEPUTY BY: 5 Attorneys for Plaintiff/Counter-Defendant Winnemucca Farms, Inc. 6 7 UNITED STATES DISTRICT COURT 8 9 DISTRICT OF NEVADA \*\*\*\*\*\* 10 CASE NO.: 3:05-CV-00385-RAM WINNEMUCCA FARMS, INC., a Nevada 11 Corporation. 12 Plaintiff. STIPULATION FOR DISMISSAL WITH 13 VS. PREJUDICE 14 LANCE ECKERSELL, ECKERSELL GROUP, INC., ARMtech INSURANACE 15 SERVICES, INC., GUIDEONE SPECIALTY MUTUAL INSURANCE CO.. 16 WESTERN NATIONAL MUTUAL INSURANCE CO., AMERICAN AGRI-17 BUSINESS INSURANCE CO., and DOES 1-30, inclusive, 18 Defendants. 19 20 ARMtech INSURANCE SERVICES, INC., **GUIDEONE SPECIALTY MUTUAL** 21 INSURANCE CO., WESTERN NATIONAL MUTUAL NSURANCE CO., and 22 AMERICAN AGRI-BUSINESS **INSURANCE CO.,** 23 Counter Claimants, 24 VŞ. 25 WINNEMUCCA FARMS, INC., a Nevada 26 corporation. 27 Counter-Defendant, 28

Plaintiff/Counter-Defendant WINNEMUCCA FARMS, INC., and Defendants 1 LANCE ECKERSELL, and ECKERSELL GROUP, INC., and Defendants/Counter-2 Claimants ARMtech INSURANCE SERVICES, INC., GUIDEONE SPECIALITY 3 MUTUAL INSURANCE CO., WESTERN NATIONAL MUTUAL INSURANCE CO., and 4 AMERICAN AGRI-BUSINESS INSURANCE CO. stipulate and agree to dismiss with 5 6 prejudice any and all claims by and among them in the above-referenced actions, with 7 each party to bear their own costs and attorneys' fees. IT IS FURTHER STIPULATED that the Court may retain jurisdiction over this 8 9 matter to enforce any issue concerning enforcement of the Settlement Agreement and Release between the parties. 10 11 12 Dated: May 24, 2011 By: / /s/ Pat Lundvall Pat Lundvall 13 McDonald Carano Wilson LLP 100 W. Liberty Street, 10th Floor 14 Reno, Nevada 89505 15 Attorney for Plaintiff/Counter-Defendant WINNEMUCCA FARMS, INC. 16 III17 III18 111 19 III20 111 21 111 22 III23 III24 III25

III

111

111

26

27

28

1	Dated: May 24, 2011	By:	/s/ Scott Hoffman
2			Lewis and Roca, LLP Bank of America Plaza
3	·		50 W. Liberty St., Suite 410 Reno, NV 89501
4			Attorney for Defendants Lance Eckersell and
5			the Eckersell Group, Inc.
6			
7	Dated: May 24, 2011	By:	/s/ Marshall S. Smith
			Marshall S. Smith Laxalt & Nomura
8			9600 Gateway Drive Reno, NV 89521
10			Attorney for Defendants/Counter-Claimants ARMtech Insurance Services Inc., Guideone
11			Specialty Mutual Insurance Co., Western National Mutual Insurance Co., and American
12			Agri-Business Insurance Co.
13	ODDED AND DETENTION OF HIRICOICTION		
	ORDER AND RETENTION OF JURISDICTION		
14	IT IS ORDERED that the above-referenced matter is dismissed with prejudice,		
15	with each party to bear their own attorneys' fees. The Court shall retain jurisdiction over		
16	this matter to enforce any issue concerning enforcement of the parties' Settlement		
17	Agreement and Release.		
18			Ma 1, 1000
19	<b>~</b> ¢		CHANNO MIN
20	Dated: May <b>3</b> , 2011		UNITED STATES MAGISTRATE JUDGE
21			ONITED STATES MASISTRATE CODSE
22			·
23			
	·		
24			
25			·
26			,
27			
28			

CERTIFICATE OF SERVICE 1 2 I hereby certify, under penalty of perjury, that I am an employee of McDonald Carano Wilson LLP and that pursuant to LR 5-3 I caused to be electronically filed on this 3 date, a true and correct copy of the STIPULATION FOR DISMISSAL WITH 4 5 PREJUDICE with the Clerk of the Court using the CM/ECF system, which will automatically e-serve the same on the attorneys of record set forth below. 6 David C. McElhinney and Scott S. Hoffmann 7 LEWIS AND ROCA, LLP Bank of America Plaza 8 50 West Liberty Street, Suite 410 9 Reno, Nevada 89501 Attorneys for Defendants Lance Eckersell and Eckersell Group, Inc. 10 Marshall S. Smith 11 Laxalt & Nomura 9600 Gateway Dr. Reno, Nevada 89521 12 Attorney for Defendants ARMtech Insurance Services Inc.. Guideone Specialty Mutual Insurance, Co., 13 Western NatiOnal Mutual Insurance Co. and American Agri-Business Insurance Co. 14 15 DATED: this 24th day of May, 2011 16 17 /s/Sally Wexler . By: Sally-Wexler 18 19 20 21 22 23

24

25

26

27

28